

1401 Main Street, Suite 900



Phone: (803) 737-0800

[jnelson@ors.sc.gov](mailto:jnelson@ors.sc.gov)

*Jeffrey M. Nelson*  
*Chief Legal Officer*

March 8, 2019

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Application of Duke Energy Progress, LLC for Adjustments in Electric Rate Schedules and Tariffs and Request for an Accounting Order; and  
Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules and Tariffs and Request for an Accounting Order  
**Docket Nos. 2018-318-E and 2018-319-E**

Dear Ms. Boyd:

Please find enclosed for these dockets, the South Carolina Office of Regulatory Staff's Motion to Establish a New and Separate Hearing Docket to Review and Consider the Companies' Grid Improvement Plan.

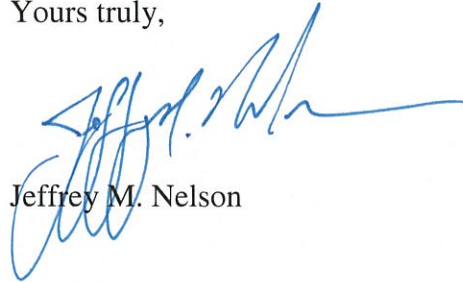
Approval of the Grid Improvement Plan ("GIP") in these proceedings would unconstitutionally deprive utility customers of procedural due process by limiting their right to timely challenge the prudence of the future phases of the GIP and by failing to provide an opportunity for meaningful review of the GIP within the context of these expansive and complex dockets.

ORS respectfully requests that the Commission remedy the lack of due process and shortage of time to comprehensively examine the GIP proposal by requiring Duke Energy Progress, LLC and Duke Energy Carolinas, LLC to file a request to establish a separate docket to

Letter – Jocelyn G. Boyd, Esquire  
Page 2 of 2  
March 8, 2019

examine the GIP. ORS stands ready to take a leading role coordinating the transition to a new docket consistent with its duty to represent the public interest.

Yours truly,



Jeffrey M. Nelson

Encl.

cc: Joseph Melchers, Esquire (via E-mail)  
Randall Dong, Esquire (via E-mail)  
All parties of record (via E-mail)